

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

BROCK FREDIN,

Plaintiff,

--against--

GRACE ELIZABETH MILLER,
CATHERINE MARIE SCHAEFER,

Defendants.

Case No. **18-cv-466-SRN-HB**

**PLAINTIFF'S MOTION TO EXTEND
FACT DISCOVERY**

Plaintiff Brock Fredin ("Plaintiff"), proceeding *pro se*, hereby submits this motion pursuant to Fed. R. Civ. P. 25(e) and 45 C.F.R. §§ 160 and 164 to extend discovery sixty (60) days in the above-captioned matter. In support thereof, Plaintiff states:

PLAINTIFF'S MOTION TO EXTEND FACT DISCOVERY

1. Plaintiff filed his complaint on July 18, 2017. The parties currently have a discovery close date of October 1, 2019
2. On August 31, 2019 Defendants noticed a deposition of Plaintiff dated September 30, 2019.
3. On August 31, 2019, Defendants noticed Plaintiff of their Interrogatories and requests for production of documents. Defendants requested medical documents and histories.
4. On September 6, 2019 Plaintiff noticed Defendants of his Interrogatories and requests for production of documents.

5. In early September, Plaintiff diligently noticed Defendants of his inability to comply with the deposition notice due to limited financial resources as a result of Defendants actions.

6. Based on Defendants actions, Plaintiff is currently working in Milwaukee Wisconsin as an engineer, homeless, living in his car, awaiting his first paycheck. At present, Plaintiff has limited resources to pay for gas and/or travel until he receives the payment described above. Plaintiff is currently on food stamps. Plaintiff expected his first paycheck on September 30, 2019 but it has not posted. Upon information and belief, Plaintiff expects his first paycheck within the next day or week. Plaintiff states that discovery is extraordinarily difficult if not impossible without a stable income and housing.

7. In early September, Defendants counsel noticed Plaintiff that they are filing a protective order that attempts to illegally and facially unconstitutionally block Plaintiff from taking depositions of Defendants based on their unlawful exploitation of their rubber-stamped harassment restraining orders. Plaintiff alleges that Defendants are illegally depriving Plaintiff of access to the courts.

8. On September 27, 2019 Plaintiff received Defendants counsel discovery objections stating that they would not comply with Plaintiff's Interrogatory or Requests for Production of Document requests.

9. On September 30, 2019 Plaintiff sent and Defendants counsel received a first set of Interrogatories and document productions with limited objections in compliance with their August 31, 2019 requests. Hundreds of documents were sent by Plaintiff and received by Defendants.

10. Defendants counsel has communicated that they object to an extension of discovery.

11. This is Plaintiff's first request for an extension of discovery.

WHEREFORE, for reasons set forth above, Plaintiff respectfully request this Honorable Court extend discovery sixty (60) days.

Dated: September 30, 2019
Milwaukee, WI

Respectfully Submitted,

s/ Brock Fredin

Brock Fredin
Milwaukee, WI
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, *Pro Se*

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Case No. **18-CV-466-SRN-HB**

Plaintiff,

--against--

MEET AND CONFER STATEMENT

GRACE ELIZABETH MILLER,
CATHERINE MARIE SCHAEFER

Defendants.

I, BROCK FREDIN, proceeding *pro se*, hereby certify that:

I met and conferred with opposing parties by:

1. On September 27, 2019 I emailed a conference call request to Defendants counsel Adam C. Ballinger and K. Jon Breyer in reference to this discovery extension request
2. On September 27, 2019 Defendants counsel K. Jon Breyer responded by email objecting to the request in writing and declined a call or further communication in reference to the request.

Discussing the following motion:

PLAINTIFF'S MOTION TO EXTEND FACT DISCOVERY (name of motion discussed).

As a result of the meet-and-confer, the parties:
(Check the box that applies.)

☒ Do **not** agree on the resolution of any part of the motion.

Agreed on all or part of the motion and request that the Court incorporate the following agreement in an order:

Dated: September 30, 2019

s/ Brock Fredin

Brock Fredin
Milwaukee, WI
(612) 424-5512 (tel.)
brockfredinlegal@icloud.com
Plaintiff, *Pro Se*

Note: All parties filing the motion must date and sign the Meet-and-Confer Statement and provide their mailing address and telephone number. Attach additional sheets of paper as necessary. The Meet-and Confer Statement must be served on each party, together with the documents required under LR 7.1(b)-(c).